

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

In the Matter of the Petition

of

GRACE OCEAN PRIVATE LIMITED
As Owner of the M/V DALI,

And

**SYNERGY MARINE PTE LTD, as Manager
Of the M/V DALI,**

for Exoneration from or Limitation of Liability

Civ. No. JKB 24-cv-0941

IN ADMIRALTY

MOTION FOR ADMISSION PRO HAC VICE

I, Randy Sparks, am a member in good standing of the bar of this Court. I am moving the admission of Patrick M. Brogan to appear pro hac vice in this case as counsel for Fornazor International, Inc.

We certify that:

1. The proposed admittee is not a member of the Maryland bar and does not maintain any law office in Maryland.
2. The proposed admittee is a member in good standing of the bars of the following State Courts and/or United States Courts.

State Court & Date of Admission

Virginia State Bar	10/02/1985
State of North Carolina	08/08/1997

U.S. Court & Date of Admission

U.S.D.C. E.D. Va.	01/31/1991
U.S.D.C. E.D. N.C.	05/07/1998
U.S.D.C. M.D. N.C.	07/28/2004
U.S. Circuit Court of Appeals for the 4 th Circuit	02/27/1991

3. During the twelve months immediately preceding this motion, the proposed admittee has been admitted pro hac vice in this Court 0 time(s).

4. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction. (NOTE: If the proposed admittee has been disbarred, suspended, or denied admission to practice law in any jurisdiction, then he/she must submit a statement fully explaining all relevant facts.)

5. The proposed admittee is familiar with the Maryland Attorneys' Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court, and understands he/she shall be subject to the disciplinary jurisdiction of this Court.

6. The proposed admittee understands admission pro hac vice is for this case only and does not constitute formal admission to the bar of this Court.

7. Either the undersigned movant or John Bredehoft, who is also a member of the bar of this Court in good standing and who has made an appearance in this case, and will serve as co-counsel in these proceedings.

8. The \$100.00 fee for admission pro hac vice accompanies this motion.

9. We hereby certify under penalties of perjury that the foregoing statements are true and correct.

MOVANT

/s/ Randy C. Sparks, Jr.
Randy C. Sparks, Jr. (MD Fed. Bar No. 06648)
KAUFMAN & CANOLES, P.C.
Two James Center
1021 East Cary Street, Suite 1400
Richmond, VA 23219
Telephone: (804) 771-5709
Facsimile: (888) 360-9092
Email: rcsparks@kaufcan.com

PROPOSED ADMITTEE

/s/ Patrick M. Brogan
Patrick M. Brogan
(Signed by Randy C. Sparks, Jr with
permission of Patrick M. Brogan)
KAUFMAN & CANOLES, P.C.
150 W. Main Street, Suite 2100
Norfolk, VA 23510
Telephone: (757) 624-3115
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CERTIFICATE OF SERVICE

In compliance with Local Rule 102.1(c), I hereby certify that on this 2nd day of October 2024, I electronically filed the above Motion for Admission *Pro Hac Vice* to the Limitation Action with the Clerk of the U.S. District Court for the District of Maryland, by using the CM/ECF system, which will send notice to all other parties who have filed in this matter.

/s/ Randy C. Sparks, Jr.

Randy C. Sparks, Jr. (MD Fed. Bar No. 06648)
KAUFMAN & CANOLES, P.C.

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Counsel for Fornazor International Inc.